

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
	)	
SEARS HOLDINGS CORPORATION,	)	
<i>et al.</i> ,	)	Case No. 18-23538 (RDD)
	)	
Debtors.	)	(Jointly Administered)
	)	

**AFFIDAVIT OF KIM BARTLETT IN SUPPORT OF CENTURYLINK  
COMMUNICATIONS, LLC'S COMBINED MOTION FOR ADMINISTRATIVE  
EXPENSE CLAIM PURSUANT TO 11 U.S.C. §§ 503(b)(1)(A) AND 365(d)(5);  
APPLICATION FOR PAYMENT OF ADEQUATE ASSURANCE PURSUANT TO  
SECTION 7 OF THE UTILITY ORDER [DKT. NO. 461]; OBJECTION TO MOTION  
OF DEBTORS REQUESTING RELEASE OF ADEQUATE ASSURANCE DEPOSIT  
AMOUNTS PURSUANT TO THE ADEQUATE ASSURANCE PROCEDURES [DKT.  
NO. 7209]**

STATE OF COLORADO )  
 ) Ss.  
COUNTY OF BROOMFIELD )

Affiant, Kim Bartlett, being duly sworn on oath, deposes and states as follows:

1. I am employed as a Senior Paralegal with CenturyLink Communications, LLC, including its parents, subsidiaries, and affiliates (collectively "CenturyLink"), in the above-captioned matter. I have worked in the legal field since 1977, starting as an assistant and legal secretary, and in August 1998, I started with Level 3 Communications, LLC as a Legal Administrative Assistant, and held various job titles within the legal department, including Sr. Legal Administrative Assistant, Executive Assistant, Paralegal, and most recently, Senior Paralegal. While at Level 3 Communication, LLC, I regularly, in the ordinary course of business, worked with various constituents at Level 3 Communications, LLC, including accounts receivable, finance, legal, and operations, regarding matters such as contracts, invoicing, bankruptcy, managing discovery and subpoenas, receiving and processing service of process, and

collections, among others. One of my duties was to monitor, receive, and acknowledge service of process made upon Level 3 Communications, LLC via its registered agent, CT Corporation System. I also was responsible for all aspects of Level 3 Communications, LLC's representation in its bankruptcy matters, including the receipt of service and pleadings, preparation of pleadings, analyses regarding ordinary course of business and new value defenses, along with generally managing the portfolio of cases with outside counsel. When CenturyLink closed on its acquisition of Level 3 Communications, LLC in November 2017, I transitioned into the same role with CenturyLink.

2. I am over 18 years of age and have personal knowledge of the facts stated in this Affidavit, which I am stating under penalty of perjury.

**First Year of Reconciliation Efforts**

3. In December 2018, I began working on CenturyLink's claims in the Debtors' bankruptcy, first by preparing the Proofs of Claim that CenturyLink filed.

4. On February 8, 2019, Dennis Diamond, then "Category Manager, Procurement" with "Sears Holdings Management Corporation," contacted CenturyLink for invoices in an effort to reconcile cure amounts. From February 11, 2019 through to the present, I was then personally involved in the reconciliation process, as displayed in the attached Exhibit A, true and correct copies of emails showing the early stages of the reconciliation process. For example, on February 12, 2019, I prepared a zip file that included CenturyLink Proofs of Claim, account numbers, and invoice numbers for CenturyLink's affiliate, Level 3 Communications, LLC, and I sent the same to the CenturyLink account manager assigned to the Debtors, who then sent the zip file to the Debtors on February 13, 2019. In March of 2019 I then sent a thumb drive of the same

zip file, plus additional invoices from other CenturyLink affiliates, to Yianni Georgakas of the Debtors for purposes of reconciliation.

5. My contacts with the Debtors, and later Transform, would sometime be as frequent as several times per week, but in the summer of 2019, my contacts were much less frequent, then increasing to monthly or more often from mid-September 2019 and thereafter, during which I assisted CenturyLink's credit and collections department with the reconciliation process with Transform.

6. The attached Exhibit B, true and correct copies of emails, displays the reconciliation efforts that CenturyLink engaged in during the fall and winter of 2019, in which I directly participated, that included CenturyLink sending the same personnel and Transform multiple invoices, or spreadsheets summarizing the same, in approximately two rounds between September 17, 2019 and December 17, 2019.

7. On December 12, 2019, I and a team from CenturyLink met with a team from Transform in a lengthy phone conference to discuss both amounts owed to CenturyLink on accounts Transform and the Debtors were using and overall reconciliation of those accounts. The Transform team included Dennis Diamond, Tina Roesslein, and Stuart Ironside, as well as others. Then, on December 17, 2019, I sent Transform another spreadsheet with cure amounts for CenturyLink's affiliate, Level 3 Communications, LLC.

8. I am familiar with the methods by which CenturyLink keeps records in the ordinary course of business. It is the custom and practice of CenturyLink that, when information regarding a transaction or event is entered into its systems or computers, such information is entered at or near the time of the transaction or event by an individual with personal knowledge or transmitted from an individual with personal knowledge. Regarding emails, including those

involved in this matter, CenturyLink regularly electronically stores and retains such emails starting near the period when CenturyLink receives or sends such an email, and I, in my role at CenturyLink and in accordance with CenturyLink policies and procedures and applicable law, have access to my own email and on a limited basis, the email of CenturyLink employees for purposes such as responding to subpoenas, discovery, and other legal processes.

9. Further, it is CenturyLink's custom and practice that these systems and computers, and the information they provide, are kept in the regular course of CenturyLink's business activity, and it is the regular practice of CenturyLink to utilize these systems and computers and the information they provide on an ongoing basis, all in accordance with applicable CenturyLink policies and procedures and applicable law.

#### **M-III, Opt-In Ballot**

10. In reviewing my personal knowledge and my internal CenturyLink email history, many of which are privileged communications within the legal department and with control persons at CenturyLink, I determined that on November 19, 2019, I discovered that the Debtors or M-III had improperly sent CenturyLink's Opt-In Ballot to an unmanned payment lockbox designed to receive customer payments that my employer has maintained for a number of years. I do not know when the unmanned lockbox received the Opt-In Ballot. At all times relevant to this matter, CT Corporation System has been CenturyLink's and each of its affiliated entities, including Level 3 Communications, LLC's registered agent for purposes of receiving service of process, and I receive communications and pleadings from CT Corporation System on a near daily basis, on behalf of CenturyLink and its affiliates.

11. Thereafter, in reviewing my personal knowledge and my internal CenturyLink email history, many of which are privileged communications within the legal department and

with control persons at CenturyLink, I determined on December 20, 2019 that I had earlier received an email from M-III on Saturday, November 23, 2019 in which M-III requested further, at this point duplicative, data to reconcile CenturyLink's Opt-In Ballot, Unique E-Ballot ID# 182353801022528, with a comprehensive administrative claim amount for all CenturyLink entities in the amount of \$331,086.28.

I state under penalty of perjury that the facts set forth above are true and correct.

Further Affiant sayeth naught.

Kim Bartlett  
Senior Paralegal  
CenturyLink

STATE OF COLORADO )  
 ) Ss.  
COUNTY OF BROOMFIELD )

On this 18<sup>TH</sup> day of February 2020, before me personally appeared Kim Bartlett, known to me to be the person described in and who executed the within instrument, and acknowledged to me that she executed the same.

CHRISTA P MONTOYA  
NOTARY PUBLIC  
STATE OF COLORADO  
NOTARY ID 20164026067  
MY COMMISSION EXPIRES JULY 11, 2020

Christa Montoya  
Notary Public  
My Commission expires: 7-11-20

# **EXHIBIT A**

**Schneider, Lucas L.**

---

**From:** Schneider, Lucas <lucas.schneider@centurylink.com>  
**Sent:** Wednesday, February 20, 2019 3:26 PM  
**To:** Kitchen, Kevin P.; Michael, Brittany M.; Caldie, Ed  
**Cc:** Bartlett, Kim  
**Subject:** FW: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

**External Email – Use Caution**

Hi Kevin, Britt, and Ed,

Thanks,  
Lucas

**Lucas L. Schneider**  
Associate General Counsel  
Legal Department  
CenturyLink  
931 14th St, 9th floor  
Denver, CO, 80202  
p: 720-888-7380  
e: lucas.schneider@centurylink.com

---

**From:** Schneider, Lucas  
**Sent:** Wednesday, February 20, 2019 3:11 PM  
**To:** Boyle, Dan <dan.boyle@level3.com>; Bartlett, Kim <kim.bartlett@level3.com>  
**Cc:** Griffin, Richard <richard.griffin@level3.com>; Green, Dawna <dawna.green@level3.com>; Snider, John <john.snider@level3.com>; Irwin, William <william.irwin@level3.com>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Best,  
Lucas

**Lucas L. Schneider**  
Associate General Counsel  
Legal Department

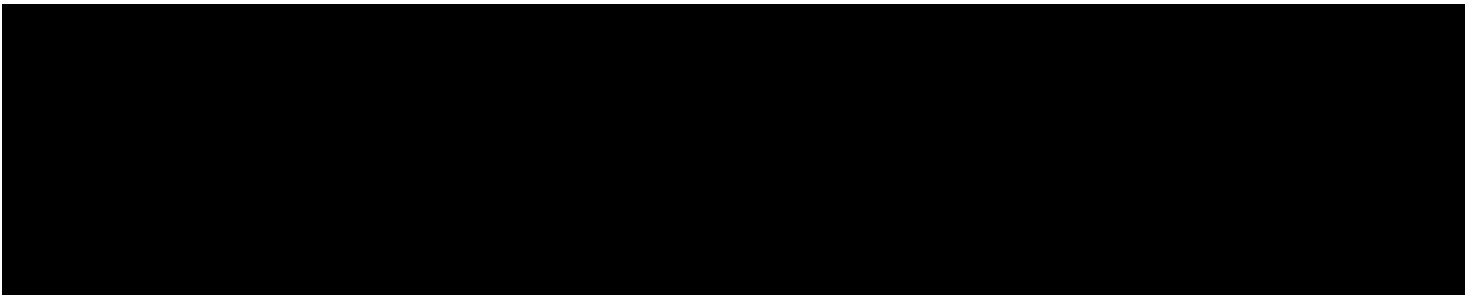


CenturyLink  
931 14th St, 9th floor  
Denver, CO, 80202  
p: 720-888-7380  
e: [lucas.schneider@centurylink.com](mailto:lucas.schneider@centurylink.com)

---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Sent:** Wednesday, February 20, 2019 3:04 PM  
**To:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Cc:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Lucas,

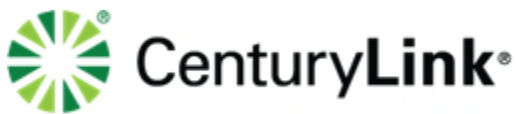


Regards,

Dan

**Dan Boyle**

Sr. Account Director  
Enterprise Network Services  
CenturyLink  
600 W. Chicago Ave., 3<sup>rd</sup> Floor  
Chicago, IL 60654  
w: 312-895-8364  
m: 630-991-1898  
e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)



---

**From:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>  
**Sent:** Wednesday, February 20, 2019 2:52 PM  
**To:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Cc:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Dan,



Thanks,  
Lucas

**Lucas L. Schneider**

Associate General Counsel

Legal Department

CenturyLink

931 14th St, 9th floor

Denver, CO, 80202

p: 720-888-7380

e: [lucas.schneider@centurylink.com](mailto:lucas.schneider@centurylink.com)

---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>

**Sent:** Wednesday, February 20, 2019 1:12 PM

**To:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>

**Cc:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>

**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Kim,

Dan

**Dan Boyle**

Sr. Account Director

Enterprise Network Services

CenturyLink

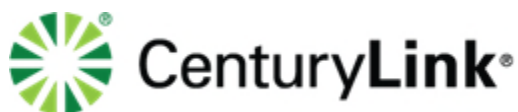
600 W. Chicago Ave., 3<sup>rd</sup> Floor

Chicago, IL 60654

w: 312-895-8364

m: 630-991-1898

e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)



---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>

**Sent:** Thursday, February 14, 2019 3:48 PM

**To:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>

**Cc:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Green, Dawna

<[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>

**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Kim,

Thanks,

Dan

**Dan Boyle**

Sr. Account Director  
Enterprise Network Services  
CenturyLink  
600 W. Chicago Ave., 3<sup>rd</sup> Floor  
Chicago, IL 60654  
w: 312-895-8364  
m: 630-991-1898  
e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)



**CenturyLink®**

---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>

**Sent:** Wednesday, February 13, 2019 6:20 PM

**To:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>

**Cc:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>

**Subject:** Re: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Dan

Dan Boyle  
Sr. Account Director  
CenturyLink  
W#: 312-895-8364  
M#: 630-991-1898  
[dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)

Sent from my mobile phone

On Feb 13, 2019, at 6:18 PM, Bartlett, Kim <[Kim.Bartlett@level3.com](mailto:Kim.Bartlett@level3.com)> wrote:

Thanks Dan!



-Kim

---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Sent:** Wednesday, February 13, 2019 4:55 PM  
**To:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Thank you everyone (and especially Kim) for your help with this request!

I have forwarded to SHC for their review. To help set expectations with the client, when do you think we should tell them we expect to provide the same data for their fCTL services included in our pre-petition claim?

Thanks again!

Dan

**Dan Boyle**

Sr. Account Director  
Enterprise Network Services  
CenturyLink  
600 W. Chicago Ave., 3<sup>rd</sup> Floor  
Chicago, IL 60654  
w: 312-895-8364  
m: 630-991-1898  
e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)

<image001.png>

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**From:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>  
**Sent:** Wednesday, February 13, 2019 7:32 AM  
**To:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Thank you Kim!

**From:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Sent:** Tuesday, February 12, 2019 6:59 PM  
**To:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>; Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hello All,

[REDACTED] attached is a zip file containing the filed POCs (which include supporting invoices) on the **red** side together with a spreadsheet listing service location(s), account number(s), and corresponding invoice numbers that made up the pre-petition POCs. Note there are four (4) service locations on the spreadsheet (highlighted) that were not included on any of the POCs I filed or invoices I have.

Dan – [REDACTED], you should be OK to send these attachments on to Sears. In the meantime, I'll reach out to the **green** side collections contacts and ask them to start pulling information to duplicate what we have here (*and to include, at a minimum, the summary page(s) from each supporting invoice*). There are hundreds of accounts on the green side, so this may take some time ...

Thank you and please don't hesitate to reach out with any questions.

-Kim

**Kim Bartlett**  
Sr. Paralegal – Litigation  
Law Department  
CenturyLink  
p: 720.888.2515  
e: [kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)

<image002.jpg>

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**From:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>  
**Sent:** Tuesday, February 12, 2019 3:09 PM  
**To:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>; Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi All,

[REDACTED]

[REDACTED]

Lucas

**Lucas L. Schneider**  
Associate General Counsel  
Legal Department  
CenturyLink  
931 14th St, 9th floor  
Denver, CO, 80202  
p: 720-888-7380  
e: [lucas.schneider@centurylink.com](mailto:lucas.schneider@centurylink.com)

---

**From:** Boyle, Dan  
**Sent:** Tuesday, February 12, 2019 1:04 PM  
**To:** Griffin, Richard ; Schneider, Lucas ; Green, Dawna  
**Cc:** Snider, John ; Irwin, William ; Bartlett, Kim  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Finance, Legal & Credit Teams,

[REDACTED]

Thanks,

Dan

**Dan Boyle**  
Sr. Account Director  
Enterprise Network Services  
CenturyLink  
600 W. Chicago Ave., 3<sup>rd</sup> Floor  
Chicago, IL 60654  
w: 312-895-8364  
m: 630-991-1898  
e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)

<image001.png>

**From:** Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>  
**Sent:** Monday, February 11, 2019 9:50 AM  
**To:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>; Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Thanks Lucas

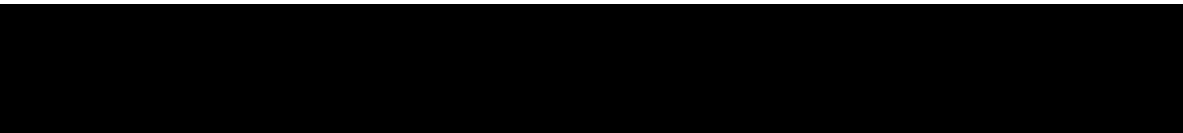
Dan:  
CTL has already provided the information and support for its pre-petition claim amounts. Those claims have been filed with the Court which Sears can obtain.  
Please have Sears provide its support for the values it has provided so the delta can be reconciled.

Thank you  
Dick Griffin

---

**From:** Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>  
**Sent:** Monday, February 11, 2019 9:38 AM  
**To:** Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>; Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>; Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>  
**Subject:** RE: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Dawna,



Lucas

**Lucas L. Schneider**  
Associate General Counsel  
Legal Department  
CenturyLink  
931 14th St, 9th floor  
Denver, CO, 80202  
p: 720-888-7380  
e: [lucas.schneider@centurylink.com](mailto:lucas.schneider@centurylink.com)

---

**From:** Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Sent:** Monday, February 11, 2019 8:27 AM  
**To:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>; Griffin, Richard <[Richard.Griffin@Level3.com](mailto:Richard.Griffin@Level3.com)>; Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>; Schneider, Lucas <[lucas.schneider@level3.com](mailto:lucas.schneider@level3.com)>  
**Subject:** CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Dan,

I am copying our legal group as they would be the ones to work with Sears to reconcile the pre-petition balances. Mr. Diamond is requesting documentation of our pre-petition balances but all that information including invoice #'s and copies were submitted when we filed our claim. This is something that Sears already has access to. Our legal group will review this request and information and will work with Sears to reconcile.

Thank you.

Dawna Green

**Dawna Green**

Senior Credit Analyst  
Customer Financial Services  
CenturyLink  
100 S. Cincinnati Ave., Suite 1200, TC13-211F  
Tulsa, OK 74103  
p: 918-547-7369  
f: 720-567-1413  
e: [dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)

<image002.jpg>

---

**From:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Sent:** Friday, February 08, 2019 5:15 PM  
**To:** Green, Dawna <[Dawna.Green@Level3.com](mailto:Dawna.Green@Level3.com)>  
**Cc:** Snider, John <[john.snider@level3.com](mailto:john.snider@level3.com)>; Irwin, William <[William.Irwin@Level3.com](mailto:William.Irwin@Level3.com)>  
**Subject:** FW: CenturyLink - pre-petition invoice claim (Sears Holdings Corporation)

Hi Dawna,

This just came to me from Sears Procurement. I'm not sure how to handle this so wanted to float this up to you as Dick Griffin notified me on 10/15/18 that you would be handling Finance issues for Sears when they announced their Chapter 11 filing.

Can you please have someone on your team help with me with customer's request below or advise on who we should bring this to for billing verification/recompilation of their accounts for payment to be made?

My CSM is CC'd on this email as well for visibility.

Thanks,

Dan

**Dan Boyle**

Sr. Account Director



Enterprise Network Services  
CenturyLink  
600 W. Chicago Ave., 3<sup>rd</sup> Floor  
Chicago, IL 60654  
w: 312-895-8364  
m: 630-991-1898  
e: [dan.boyle@centurylink.com](mailto:dan.boyle@centurylink.com)

<image001.png>

---

**From:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Sent:** Friday, February 8, 2019 4:36 PM  
**To:** Boyle, Dan <[Dan.Boyle@Level3.com](mailto:Dan.Boyle@Level3.com)>  
**Cc:** Murzyn, Clarence (Contractor) <[Clarence.Murzyn@searshc.com](mailto:Clarence.Murzyn@searshc.com)>; Georgakas, Yianni  
<[Yianni.Georgakas@searshc.com](mailto:Yianni.Georgakas@searshc.com)>  
**Subject:** CenturyLink - pre-petition invoice claim

Dan attached is CenturyLink's appeal concerning its pre-petition claims. Below is a table that summarizes what CenturyLink is claiming and what our AP says is the amount owed. Our task is the reconciling the deltas. To do this I need an **Excel** file from CenturyLink listing out the invoices that support the amounts claimed by CenturyLink. The report should have the invoice number, invoice date, invoice amount and if there was a procurement document (PO, etc) that info also. A breakout between CenturyLink and L3 may prove helpful since that is the format of your firm's claim

Once I have that we will compare that listing to our AP listing and see what is causing this large delta. I may then need to get invoice copies from CenturyLink

Like a response by Monday that you got this email and a date when you can get me the Excel file.

Vendor	Vendor Cure Amount	SHC Cure Amount	Delta
Century Link	\$ 138,563.47	\$ 82,907.00	\$ 55,656.47
Level 3	\$ 654,631.27	\$ 458,677.00	\$ 195,954.27
TOTAL	\$ 793,194.74	\$ 541,584.00	\$ 251,610.74

Regards,

Dennis Diamond  
Category Manager, Procurement  
Sears Holdings Management Corporation  
847.286.7014

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## **EXHIBIT B**

**Schneider, Lucas L.**

---

**From:** Roesslein, Tina <Tina.Roesslein@searshc.com>  
**Sent:** Monday, December 2, 2019 3:07 PM  
**To:** Bartlett, Kimberly  
**Cc:** Ironside, Stuart; Diamond, Dennis  
**Subject:** RE: Transform - Pre and Post-petition cure amounts - L3 only

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Hi Kim,

Below is the list of accounts that our team show as valid which differs greatly from the list you sent to us that comprises of your cure objection amount. I don't know why there is such a difference in the accounts you show and what we show as valid. At this point it might be best for everyone to get on a call. Stu is OOO until December 8<sup>th</sup> and we will need him on the call. Please advise when your team is available for a call for the week of Dec 9<sup>th</sup>.

<i>ACCOUNT NUMBER</i>
18JQJ2P
1CNSNWF
1CNSNWF
16P4PSB
18JQJ2P
18K5JB8
1CNSNWF
1E3581Z
5TCGLCHCL
18K5JB8
1CNSNWF
Sub-Total
32245-TW this an account for our SHIP affiliate
1-CAK3Q this an account for our SHIP affiliate

Thank you,

Tina Roesslein  
Transform Holdings  
IT Procurement Director  
847-286-0623

---

**From:** Bartlett, Kimberly [mailto:kim.bartlett@centurylink.com]  
**Sent:** Tuesday, November 05, 2019 3:53 PM  
**To:** Roesslein, Tina <Tina.Roesslein@searshc.com>  
**Cc:** Ironside, Stuart <Stuart.Ironside@searskmart.com>; Diamond, Dennis <Dennis.Diamond@searshc.com>  
**Subject:** RE: Transform - Pre and Post-petition cure amounts - L3 only

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Hi Tina,

Apologies for the tardy follow up. We had no record of receiving the \$458K payment, and it took the business a little time to track it down. Once found, they had to get it applied to the accounts so we would have a clear picture of what was still owed.

If my understanding is correct, Transform is assuming each of the following legacy Level 3 accounts: 1-6P4PSB, 1-JCAL3Q, 1-8K5JB8, 1-A5DDLY, 1-E3581Z, 836627P, 1-8MSW50, 5-TCGLCHCL, 1-8JQJ2P, 1-CNSNWF, 042744P, 1008154972, and 8047141. **Would you please confirm whether or not Transform is assuming account 328245-TW (account is current both pre- and post-petition).**

If the additional payment of \$193,164.10 does NOT include the October 2019 invoices on the accounts above, then I have the business team's approval to accept the additional \$193,164.10 to cure.

I believe our respective attorneys are working on a joint stipulation to resolve the cure amount/objection so I will let CTL's attorneys know we have reached agreement with respect to the legacy Level 3 (red) accounts.

Thank you and I very much appreciate all your hard work and patience while we sorted this out.

-Kim

---

**From:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Sent:** Tuesday, November 5, 2019 8:44 AM  
**To:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Cc:** Ironside, Stuart <[Stuart.Ironside@searskmart.com](mailto:Stuart.Ironside@searskmart.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Transform - Pre and Post-petition cure amounts - L3 only

Hi Kim,

Do you have an update? We need to close out the objection that Level 3 filed.

Thank you,

Tina Roesslein  
Transform Holdings  
IT Procurement Director  
847-286-0623

---

**From:** Bartlett, Kimberly [<mailto:kim.bartlett@centurylink.com>]  
**Sent:** Wednesday, October 23, 2019 11:58 AM  
**To:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Ironside, Stuart <[Stuart.Ironside@searshc.com](mailto:Stuart.Ironside@searshc.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Transform - Pre and Post-petition cure amounts - L3 only

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Good morning, Tina -

Thank you for this – I have sent your analysis to our business team to review and get approval to accept the additional payment of \$193K to cure.

As soon as I hear back, I'll let you know.

Thank you!  
-Kim

---

**From:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Sent:** Wednesday, October 23, 2019 8:19 AM  
**To:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Cc:** Ironside, Stuart <[Stuart.Ironside@searshc.com](mailto:Stuart.Ironside@searshc.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Transform - Pre and Post-petition cure amounts - L3 only  
**Importance:** High

Hi Kim,

We completed an analysis of the invoices that amount to your claim objection. The results are that we show we owe you an additional \$193,164.10 in cure. The attached spreadsheet shows our analysis and how we derived at the \$193K. The additional cure you came up with was \$195K. The delta is small so I am hoping that we can reach agreement on the \$193K.

Once we reach agreement we will have our attorney draft an amendment to cover this and close it out.

I have cc'd Stu on this email. If you have any specific questions relating to the attached spreadsheet, please reach out to him.

Thank you,

Tina Roesslein  
Transform Holdings  
IT Procurement Director  
847-286-0623

---

**From:** Diamond, Dennis  
**Sent:** Thursday, September 26, 2019 2:50 PM  
**To:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Cc:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Subject:** Transform - Pre and Post-petition cure amounts - L3 only

Kim - I confirmed that the 20 PDFs you sent me match to the 20 invoices I requested of Dan Boyle on 2/21/19. I had hoped the total of these 20 would have a balance due equal to the delta between what SHC filed as a cure amount for L3 and the amount that L3 counter claimed in it objection. Unfortunately that is not true. The amount you show that is

due on these 20 invoices (Col I in the attached file) is \$51,299.17 more than the delta in our respective claims with the court

Here is the math:

L3 counter claim in its objection	-	\$654,631.27
Transform's cure amount claim for L3	-	<u>\$458,677.00</u>
Delta	-	\$195,954.27

Total balance due		
on the 20 addl invoices	-	<u>\$247,253.44</u> (total in col I in attached file)
Delta		\$51,299.17

Do I have this correct?

Also, please do not put any efforts towards Century Link. Transform rejected the Century Link contracts so under bankruptcy rules Transform is not obligated to pay those amounts. The dispute is solely with the L3 amounts owed.

Regards,

Dennis Diamond  
Category Manager, Procurement  
Transform Holdco LLC  
847.286.7014

**TRANSFORM** 

---

**From:** Bartlett, Kimberly [<mailto:kim.bartlett@centurylink.com>]

**Sent:** Wednesday, September 25, 2019 5:59 PM

**To:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>

**Subject:** RE: Sears - Pre and Post-petition cure amounts

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[Removed April Nelson as she does not handle the legacy-Level 3 claims.](#)

Mr. Diamond,

I believe the attached zip file contains all the invoices you state were missing in your email to Dan Boyle for the legacy Level 3 pre-petition claims. If, after you have had a chance to review, you believe there are any additional invoices missing, please reach out to me and I will be happy to locate and send them along.

The zip file also includes a copy of your "match" excel file, modified to show the f-Level 3 claim no., invoice dates and numbers included with each claim, amounts due on each respective invoice, any



adjustments/credits/payments, the pre-petition portion of each invoice, and the total pre-petition amount listed in each claim. The comments section lists the invoice information as it is named in the zip file.

**Do you need copies of unpaid POST-petition invoices for the legacy Level 3 accounts?**

I will begin working on the legacy CenturyLink pre-petition information tomorrow.

Thank you,

-Kim

**Kim Bartlett**

Sr. Paralegal – Litigation

Law Department

CenturyLink

p: 720.888.2515

e: [kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)



**CenturyLink®**

---

**From:** Bartlett, Kim <[Kim.Bartlett@Level3.com](mailto:Kim.Bartlett@Level3.com)>

**Sent:** Wednesday, September 25, 2019 9:35 AM

**To:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>; Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>

**Subject:** RE: Sears - Pre and Post-petition cure amounts

Very good, sir. Thank you. I will work on collecting the invoices you state are missing and get them to you as quickly as I can.

-Kim

---

**From:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>

**Sent:** Wednesday, September 25, 2019 7:37 AM

**To:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>

**Subject:** RE: Sears - Pre and Post-petition cure amounts

Kim - I provided a list of invoices we are missing in my email to Dan which was the last attachment. What L3 sent is not as relevant as what we are missing.

Regards,

Dennis Diamond

Category Manager, Procurement

Transform Holdco LLC  
847.286.7014

TRANSFORMCO

---

**From:** Bartlett, Kimberly [<mailto:kim.bartlett@centurylink.com>]  
**Sent:** Tuesday, September 24, 2019 5:59 PM  
**To:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>; Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

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Hello Mr. Diamond and Ms. Roesslein,

Please give me day or two to dig and sort through the emails going back and forth and attempt to reconcile what has been provided by CenturyLink/Level 3 and what may be missing, and get back to you.

Thank you,  
-Kim

**Kim Bartlett**  
Sr. Paralegal – Litigation  
Law Department  
CenturyLink  
p: 720.888.2515  
e: [kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)



**CenturyLink®**

---

**From:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Sent:** Tuesday, September 24, 2019 3:13 PM  
**To:** Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

Hmmm - then it seems you would be able to provide copies of the invoices that I asked Dan Boyle to provide in my email dated 2/21/19.

Regards,

Dennis Diamond  
Category Manager, Procurement  
Transform Holdco LLC

847.286.7014

TRANSFORMCO

---

**From:** Nelson, April [<mailto:April.Nelson@CenturyLink.com>]  
**Sent:** Tuesday, September 24, 2019 3:28 PM  
**To:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts  
**Importance:** High

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*The supporting documentation was gathered by me given to our legal team and then forwarded on to bankruptcy attorney/s representing Sears.*

April Nelson  
BMG BANKRUPTCY  
tel: 800-772-9313 x 2331046836  
[BMG.Bankruptcy@CenturyLink.com](mailto:BMG.Bankruptcy@CenturyLink.com)

---

**From:** Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Sent:** Tuesday, September 24, 2019 2:58 PM  
**To:** Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

April - to ensure we get back the data we need, here are 3 emails that show what I asked for, what I got and why it does not match what I asked for. Simply put, we need the actual invoices that were sent to SHC and not paid that account for the delta between what SHC says is the cure amount and what L3 says is the cure amount.

In Dan's email of 2/13/2019 is a zip file with "Proof of Claims" that L3 filed with the court. Each of these PDFs has an attachment ICON that may be the actual invoice for that claim. Problem is we cannot open and view the ICONs.

The last attachment is an email of mine to Dan Boyle which enumerates a listing of invoice numbers whose actual invoices we do not have. In that email I asked for copies. My records show I have not received these. These may be the delta we need to solve for.

2019-01-21 - Sears Holdings - Electronic Proof of Claim (Filed) (Account 1-6P4PSB-A).pdf (SECURED) - A


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**Attach Supporting Documentation** (limited to a single PDF attachment that is less than 10 MB)

☒ I have supporting documentation. (attach below) ☐ I do not have supporting documentation.

 Attachment

**PLEASE REVIEW YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION ACCORDINGLY PRIOR TO UPLOADING THEM. PROOFS OF CLAIM AND SUPPORTING DOCUMENTATION ARE PUBLIC DOCUMENTS THAT WILL BE AVAILABLE FOR ANYONE.**

**IMPORTANT NOTE REGARDING REDACTING YOUR PROOF OF CLAIM AND SUPPORTING DOCUMENTATION** When you submit a proof of claim and any supporting documentation, you must redact the following information: only the last four digits of any social-security, individual's tax-identification number; only the initials of a minor's name, and only the year of any person's date of birth; the delivery of health care goods or services, limit the disclosure of the good or service to the type of good or service; and limit the disclosure of confidential health care information.

A document has been redacted when the person filing it has masked, edited or deleted information. The responsibility for redacting personal data identifiers (as defined in the Privacy Policy) lies with the filer.

Regards,

Dennis Diamond  
Category Manager, Procurement  
Transform Holdco LLC  
847.286.7014

TRANSFORMCO

---

**From:** Nelson, April [<mailto:April.Nelson@CenturyLink.com>]  
**Sent:** Tuesday, September 24, 2019 2:33 PM  
**To:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

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*Let me do some checking on that.*

April Nelson  
BMG BANKRUPTCY  
tel: 800-772-9313 x 2331046836  
[BMG.Bankruptcy@CenturyLink.com](mailto:BMG.Bankruptcy@CenturyLink.com)

---

**From:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Sent:** Tuesday, September 24, 2019 2:20 PM  
**To:** Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>  
**Cc:** Hains, Thomas W <[tom.hains@CenturyLink.com](mailto:tom.hains@CenturyLink.com)>; Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Green, Dawna <[dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

I work with Mr. Diamond and we do not have the invoices that correlate to the cure amount that you have raised an objection to.

Thank you,

Tina Roesslein  
Transform Holdings  
IT Procurement Director  
847-286-0623

---

**From:** Nelson, April [<mailto:April.Nelson@CenturyLink.com>]  
**Sent:** Tuesday, September 24, 2019 2:15 PM  
**To:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>  
**Cc:** Hains, Thomas W <[tom.hains@CenturyLink.com](mailto:tom.hains@CenturyLink.com)>; Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Green, Dawna <[dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>  
**Subject:** RE: Sears - Pre and Post-petition cure amounts

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**Good Afternoon,**

***This was requested previously and the documentation was provided to Mr. Diamond.***

April Nelson

BMG BANKRUPTCY

tel: 800-772-9313 x 2331046836

[BMG.Bankruptcy@CenturyLink.com](mailto:BMG.Bankruptcy@CenturyLink.com)

---

**From:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>

**Sent:** Thursday, September 19, 2019 1:10 PM

**To:** Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>

**Cc:** Hains, Thomas W <[tom.hains@CenturyLink.com](mailto:tom.hains@CenturyLink.com)>; Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Green, Dawna <[dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)>; Diamond, Dennis <[Dennis.Diamond@searshc.com](mailto:Dennis.Diamond@searshc.com)>

**Subject:** RE: Sears - Pre and Post-petition cure amounts

Hi April,

Thank you for this information. We will also need invoices that correlate to these amounts.

Tina Roesslein

Transform Holdings

IT Procurement Director

847-286-0623

---

**From:** Nelson, April [<mailto:April.Nelson@CenturyLink.com>]

**Sent:** Thursday, September 19, 2019 1:05 PM

**To:** Roesslein, Tina <[Tina.Roesslein@searshc.com](mailto:Tina.Roesslein@searshc.com)>

**Cc:** Hains, Thomas W <[tom.hains@CenturyLink.com](mailto:tom.hains@CenturyLink.com)>; Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>; Green, Dawna <[dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)>

**Subject:** RE: Sears - Pre and Post-petition cure amounts

**Importance:** High

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**Good Afternoon Tina,**

***Here are the remaining Sears accounts, thank you***

April Nelson

BMG BANKRUPTCY

tel: 800-772-9313 x 2331046836

[BMG.Bankruptcy@CenturyLink.com](mailto:BMG.Bankruptcy@CenturyLink.com)

---

**From:** Green, Dawna <[dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)>

**Sent:** Tuesday, September 17, 2019 4:36 PM

**To:** [tina.roesslein@searshc.com](mailto:tina.roesslein@searshc.com)



Cc: Nelson, April <[April.Nelson@CenturyLink.com](mailto:April.Nelson@CenturyLink.com)>; Hains, Thomas W <[tom.hains@CenturyLink.com](mailto:tom.hains@CenturyLink.com)>; Bartlett, Kimberly <[kim.bartlett@centurylink.com](mailto:kim.bartlett@centurylink.com)>

**Subject:** Sears - Pre and Post-petition cure amounts

Tina,

I tried to contact you by phone, but received your voice mail. I was given your name as the correct person to discuss the Sears pre and post-petition cure balances. I have attached a spreadsheet that details the balances as of 09/17/19 on the 15 legacy Level 3 Communications accounts. There are additional legacy Centurylink accounts that are handled by April Nelson and she can assist you with the details on those accounts. Please review these balances and advise if you have any questions.

Thank you for your assistance.

**Dawna Green**

Senior Credit/Collection Analyst

Customer Financial Services

CenturyLink

100 S. Cincinnati Ave., Suite 1200, TC13-211F

Tulsa, OK 74103

p: 918-547-7369

f: 720-567-1413

e: [dawna.green@centurylink.com](mailto:dawna.green@centurylink.com)



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